

## **REMARKS/ARGUMENTS**

The Applicant acknowledges, with thanks, the office action dated December 17, 2008. Claims 1-8 are currently pending. By this amendment, claims 1 and 5 have been amended. No new matter has been added as it is disclosed in paragraph 30 of the original specification. Reconsideration of this application as amended is respectfully requested.

### **Prior-Art Matters**

Claims 1-8 were rejected to under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 4,479,350 to Newton et al (*hereinafter*, "Newton"), in view of U.S. Patent No. 4,329,842 to Hoskinson.

Independent claims 1 and 5, as currently amended, recite a system and method for exploiting power from a pressurized gas reservoir. Naturally occurring gas pressurized at a first level is received from a first portion of an associated reservoir of naturally occurring gas. The gas is directed to a turbine so as to induce motion of the turbine. A generator, coupled to the turbine, generates an electrical current induced from the motion of the turbine. The naturally occurring gas is directed from the turbine to a predetermined location at a secondary pressure level.

By contrast, Newton teaches recovering power from vaporization of liquefied natural gas. Natural gas is warmed against a multicomponent stream which is cooled and liquefied. The liquefied multicomponent stream is pumped to an elevated pressure and is warmed against one or more streams of propane which are cooled and liquefied. The warmed multicomponent stream is heated, expanded through a generator loaded expander and recycled. The liquefied propane is pumped to an elevated pressure in single or multi-staged streams, vaporized, expanded through a second generator loaded expander and recycled. However, Newton does not teach or suggest receiving naturally occurring pressurized gas from a reservoir of naturally occurring gas and using the naturally occurring pressurized gas to generate electrical power as is taught by independent claims 1 and 5. Instead, Newton teaches receiving liquefied natural gas (column 3, lines 14-16). Liquefied natural gas, as discussed in Newton, is commonly known to be a natural gas that has been converted to liquid form by means of some form of processing. Thus, the liquefied gas is received from some process and not received from a reservoir of naturally occurring gas as in claims 1 and 5. The naturally occurring gas in claims 1 and 5 used to

generate power has not undergone any form or processing or conversion. As explained in paragraph 25, the gas is recovered from a natural deposit. Therefore, Newton does not teach or suggest each and every element of independent claims 1 and 5.

The aforementioned deficiencies in Newton are not remedied by the teachings of Hoskinson. Hoskinson teaches a power conversion system utilizing reversible energy of liquefied natural gas. Hoskinson is relied on by the Office Action to teach using a portion of the electrical current to drive an associated compressor. However, as already discussed, the liquefied natural gas used in Hoskinson is not naturally occurring gas received from a reservoir of naturally occurring gas as recited in claims 1 and 5. Therefore, neither Newton or Hoskinson, alone or in combination, teach or suggest all of the limitations of independent claims 1 and 5.

Claims 2-4 depend directly from claim 1 and therefore contain each and every element of claim 1. Claims 6-8 depend directly from claim 5 and therefore contain each and every element of claim 5. Therefore, for the same reasons already set forth for claims 1 and 5, withdrawal of rejections of claims 2-4 and 6-8 is respectfully requested.

### Conclusion

Withdrawal of the rejections to this application is requested for the reasons set forth and a Notice of Allowance is earnestly solicited. If there are any fees necessitated by the foregoing communication, the Commissioner is hereby authorized to charge such fees to our Deposit Account No. 50-0902, referencing our Docket No. 10058/00005.

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Respectfully submitted,



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